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December 5, 2022

BY ECF

The Honorable Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Sentencing is adjourned to March 28, 2023,
at 11:00 a.m.

SO ORDERED.
/s/ Alvin K. Hellerstein
December 5, 2022

Re: United States v. Valencia Rocha et al., 21 Cr 236 (AKH)

Dear Judge Hellerstein:

We represent Charles Burrill in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. On August 23, 2022, pursuant to a plea agreement, Mr. Burrill pleaded guilty to one count in a superseding information charging him with violating 18 U.S.C. Section 371. Sentencing was scheduled for December 14, 2022. Following the plea proceeding, Mr. Burrill returned to his home in Oregon.

We write, without objection from the Government, to respectfully request a 90-day adjournment of Mr. Burrill's sentencing. We are still awaiting the initial draft of the presentence report. We expect to receive it this week. Furthermore, we have been in the process of gathering information from Mr. Burrill's family members and friends, related to his history and background, his positive characteristics, and other important mitigating information. As such, an adjournment is necessary to review the presentence report and complete the work to prepare our sentencing submission for the Court.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti
Shannon McManus
Kestine Thiele